

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

	)	
	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 24-cr-10140
	)	
ENALD BEQIRAJ,	)	
Defendant.	)	
	)	
	)	

**MOTION TO PERMIT TRAVEL TO TURKEY**

Now comes the defendant Enald Beqiraj, by and through undersigned counsel, and hereby respectfully requests this Honorable Court to permit him to travel to Dikili/İzmir, Turkey from August 5 to August 28 to visit his fiancé and her family.

Mr. Beqiraj was sentenced to a four-month term of imprisonment. Mr. Beqiraj served his term of imprisonment and is now serving his three-year term of supervised release. Jurisdiction was transferred to the District of Massachusetts on May 14, 2024, *see* Dkt. 1. Since Mr. Beqiraj's release from confinement, he has fully and faithfully complied with all his conditions of supervised release. He has found employment, made the required restitution payments under the terms specified by the Probation Office, and completed his mental health assessment. In March of 2024, Mr. Beqiraj, with permission from Judge Schofield, completed a trip to Albania to visit his grandfather without incident.

Mr. Beqiraj seeks to take the next the major step in his life by getting married to his fiancé, who currently resides with her family in Dikili/İzmir, Turkey. Accordingly, Mr. Beqiraj respectfully seeks this Honorable Court's permission to travel to Dikili/İzmir, Turkey from August 5 to August 28 to visit them. Mr. Beqiraj's employer approved the requested travel and will allow

Mr. Beqiraj to work remotely during the relevant dates. The requested travel will not impact Mr. Beqiraj's employment or his ability to make restitution payments. Indeed, his expenses during the trip (where he will be staying at his fiancé's home) are not expected to exceed his basic living expenses in the United States and his family will assist with any travel related expenses. A full travel itinerary will be provided to the Probation Office in advance of the requested travel.

**WHEREFORE**, the defense respectfully requests that the instant request be granted.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

The Probation Office, by and through, Probation Officer Domenica Soto denied Mr. Beqiraj's travel request, but has confirmed that Mr. Beqiraj is in compliance with his conditions of supervised release, including his scheduled restitution payments. As detailed above, the defense does not believe that this trip will negatively impact Mr. Beqiraj's ability to make scheduled restitution payments.

No AUSA is presently assigned to this case. AUSA Kedar Bhatia, who represented the government in the Southern District of New York has moved to the U.S. Attorney's Office in Los Angeles. If this Honorable Court requires the government's position, the defense will request that a prosecutor from U.S. Attorney's Office in the Southern District of New York or the District of Massachusetts be assigned.

Respectfully Submitted,

Enald Beqiraj  
By His Attorney,

**/s/ Maksim Nemtsev**  
Maksim Nemtsev, Esq.  
Mass. Bar No. 690826  
20 Park Plaza, Suite 1000  
Boston, MA 02116  
(617) 227-3700  
menemtsev@gmail.com

Dated: July 8, 2024

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, July 8, 2024, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

**/s/ Maksim Nemtsev**  
Maksim Nemtsev, Esq.